

**Under Seal**

**ORIGINAL**

1 NICOLA T. HANNA  
United States' Attorney  
2 LAWRENCE S. MIDDLETON  
Assistant United States Attorney  
3 Chief, Criminal Division  
JOSEPH B. WIDMAN (Cal. SBN 256189)  
4 Assistant United States Attorney  
Chief, Riverside Branch Office  
5 3403 10th Street, Ste. 200  
Riverside, California 92501  
6 Telephone: (951) 276-6945  
Facsimile: (951) 276-6202  
7 Email: Joseph.Widman@usdoj.gov

8 Attorneys for Plaintiff  
UNITED STATES OF AMERICA

9 UNITED STATES DISTRICT COURT

10 FOR THE CENTRAL DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 RONNIE RUBEN KAPLAN JR.,

15 Defendant.

ED CR 18-00315 FMO  
ND. ED. CH. 18

GOVERNMENT'S EX PARTE APPLICATION  
FOR ORDER SEALING INDICTMENT AND  
RELATED DOCUMENTS; DECLARATION OF  
JOSEPH B. WIDMAN

(UNDER SEAL)

1 NICOLA T. HANNA  
2 United States Attorney  
3 LAWRENCE S. MIDDLETON  
4 Assistant United States Attorney  
5 Chief, Criminal Division  
6 JOSEPH B. WIDMAN (Cal. SBN 256189)  
7 Assistant United States Attorney  
8 Chief, Riverside Branch Office  
9 3403 10th Street, Ste. 200  
10 Riverside, California 92501  
11 Telephone: (951) 276-6945  
12 Facsimile: (951) 276-6202  
13 Email: Joseph.Widman@usdoj.gov

*FILED*

*NOV 14 2008*

*OC*

8 Attorneys for Plaintiff  
9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

ED No. ED CR 18-00315 FMO  
**GOVERNMENT'S EX PARTE APPLICATION  
FOR ORDER SEALING INDICTMENT AND  
RELATED DOCUMENTS; DECLARATION OF  
JOSEPH B. WIDMAN**

13 Plaintiff,

14 v.

15 RONNIE RUBEN KAPLAN JR.,

16 Defendant.

**(UNDER SEAL)**

17 The government hereby applies ex parte for an order that the  
18 indictment and any related documents in the above-titled case (except  
19 the arrest warrants for the charged defendants(s)) be kept under seal  
20 until the government files a "Report Commencing Criminal Action" in  
21 this matter.

22 //

23 //

24 //

25

26

27

28

This ex parte application is made pursuant to Federal Rule of Criminal Procedure 6(e)(4) and is based on the attached declaration of Joseph B. Widman.

Dated: November 14, 2018

Respectfully submitted,

NICOLA T. HANNA  
United States Attorney

LAWRENCE S. MIDDLETON  
Assistant United States Attorney  
Chief, Criminal Division

~~JOSEPH B. WIDMAN~~  
Assistant United States Attorney

Attorneys for Plaintiff  
UNITED STATES OF AMERICA

**DECLARATION OF JOSEPH B. WIDMAN**

I, Joseph B. Widman, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I represent the government in the prosecution of United States v. Ronnie Ruben Kaplan Jr., the indictment in which is being presented to a federal grand jury in the Central District of California on November 14, 2018.

2. Defendant Ronnie Ruben Kaplan Jr. ("defendant") has not been taken into custody on the charge contained in the indictment and has been informed that he is being named as a defendant in the indictment to be presented to the grand jury on November 14, 2018. The likelihood of apprehending defendant might jeopardized if the indictment in this case were made publicly available before the defendant is taken into custody on the indictment.

3. Accordingly, the government requests that the indictment and sealed documents in this case (except the arrest warrant) be sealed and remain so until the defendant is taken into custody on the charge contained in the indictment and the government files a "Report Commencing Criminal Action" in this matter.

4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at Riverside, California, on November 7, 2018.

~~JOSEPH B WIDMAN~~